

FILED

DEC 15 2009

[Signature]
CLERK

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
DIVISION

Andrew Fischer

Plaintiff(s),

vs.

Defendant(s).

Case No. 09-1014
(To be supplied by the Clerk)

COMPLAINT

JURISDICTION

1.

CLAIM(S)

2. My wife Shirley had a nervous break-down in Wyoming in April of 1986 and got better
3. under the counseling of psychologist Fred Lindberg. We moved to Bemidji in Aug. 1987
4. and to Aberdeen in 1989. Duane Kavanaugh did a psychological evaluation for the
5. school on daughter Chrissy and told her if he didn't have a client he wouldn't make any
money. Then he conned the wife into therapy and kept her angry at me from Aug. 1990
to divorce in May 1996, yielding total family destruction. Chrissy and Mark and Shirley ill.

PRAYER FOR RELIEF

Plaintiff requests the following relief:

1. **\$500,000.00 for damages to family, failure to cure Shirley (police officer called it SCAM)**
2. **\$2,500,000.00 for excessive pain and suffering for the whole family**

Dated this 7 day of December, 2009

Andrew Fischer
(Signature Line)

Andrew Fischer

(Printed Name of Plaintiff), Pro Se

P.O. Box 905

Address

Aberdeen, SD 57402-0905

City/State/Zip Code

1-605-229-0867

Telephone Number

Defendants

Duane Kavanaugh, MSW, therapist; and the
North-Eastern Mental Health Center
703 - 3rd Ave. SE; Aberdeen, SD 57401
Dr. Sanjeevi Giridhar, psychiatrist,
NEMHC 628 Circle Drive, Aberdeen, SD
He prescribed antidepressive medications for
Chrissy and Shirley; and they looked doped
up and glassy-eyed quite often
Psychologist Mark Hedges dir. of NEMHC
(former), 1016 N. Main St.; Aberdeen, SD
Duane Kavanaugh, res. 508 N. 3rd St.
Groton, SD 57445

Complaint for:

Defamation of character using the other
Andrew Fischer's records and
Reputation to "frame" me in front of my
wife and children as an alcoholic. This
new evidence came to my attention in
April 2009, so the time to file should
start over and must be filed by April 2011.
Medical Mal-Practice intensifying

Shirley's illness and causing Chrissy
and me to go into depression, angering
Shirley rather than curing her and
destroying our relationships and our
home. Chrissy and Mark are in dire need
have mental problems and can't
support themselves adequately.
Undue agitation and false accusations
by the therapist to anger and scam.

Jurisdiction

Federal Laws governing Mental Health Professionals, Our Family's right to receive
proper treatment from a properly trained professional; Oath of Hypocrates for
professional treatment; US Constitution and Civil Rights.